

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

HAMID HASSAN RAZA; MASJID AL-ANSAR;
ASAD DANDIA; MUSLIMS GIVING BACK;
MASJID AT-TAQWA; MOHAMMAD ELSHINAWY,

Plaintiffs,

v.

CITY OF NEW YORK; MICHAEL R. BLOOMBERG,
in his official capacity as Mayor of the City of New
York; RAYMOND W. KELLY, in his official capacity
as Police Commissioner for the City of New York;
DAVID COHEN, in his official capacity as Deputy
Commissioner of Intelligence for the City of New York,

Defendants.

No. 13-cv-03448-PKC-JMA

Hon. Judge Pamela Chen

PLAINTIFFS' NOTICE OF MOTION FOR EXPEDITED DISCOVERY

Upon the pleadings and papers in this matter, Plaintiffs now move this Court before the Honorable Pamela K. Chen, United States District Court Judge, at the United States Courthouse, 225 Cadman Plaza East, Brooklyn, New York, for expedited discovery in anticipation of Plaintiffs' motion for a preliminary injunction.

As set forth in the Memorandum in Support of Plaintiffs' Motion for Expedited Discovery and the Declaration of Patrick Toomey, Esq., and accompanying exhibits, Plaintiffs are entitled to expedited discovery in order to set before the Court additional facts demonstrating (1) the NYPD's policy and practice of investigating Muslims on the basis of their religion, and (2) the application of this discriminatory policy and practice to the NYPD's surveillance of Plaintiffs.

Plaintiffs therefore move this Court for an order permitting Plaintiffs to serve their First Request for the Production of Documents, dated October 8, 2013 (a copy of which is attached as Schedule A), and their First Set of Interrogatories, dated October 8, 2013 (a copy of which is attached as Schedule B), on Defendants.

Dated: October 8, 2013
New York, New York

Respectfully submitted,

/s/ Hina Shamsi

Hina Shamsi (HS-6908)
Nusrat J. Choudhury (NC-2676)
Patrick Toomey (PT-4354)
American Civil Liberties Union Foundation
125 Broad Street, 18th Floor
New York, NY 10004
T: 212.549.2500
F: 212.549.2654
hshamsi@aclu.org

Ramzi Kassem (RK-3567)
Diala Shamas (DS-4123)
CLEAR project
Main Street Legal Services, Inc.
CUNY School of Law
2 Court Square
Long Island City, NY 11101
T: 718.340.4558
F: 718.340.4478
ramzi.kassem@law.cuny.edu

Arthur N. Eisenberg (AE-2012)
Mariko Hirose (MH-0313)
New York Civil Liberties Union Foundation
125 Broad Street, 19th Floor
New York, NY 10004
T: 212.607.3300
F: 212.607.3318
aeisenberg@nyclu.org

CERTIFICATE OF SERVICE

I, Hina Shamsi, certify that on October 8, 2013, I served the foregoing Motion for Expedited Discovery and accompanying papers upon Defendants, by operation of the Court's electronic filing system:

/s/ Hina Shamsi

Hina Shamsi

October 8, 2013